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Federal Communications Commission

C/O Office of the Secretary

Washington, D.C. 20554

RE: Action Items For The FCC's Localism Task Force (Docket RM-10803)

Dear Commissioners and Staff Members of the FCC's Localism Task Force,

I am Daniel Brown, a media professional and someone who lives in a city without any community radio service. I commend the FCC for initiating the Localism Task Force.

The first step in restoring localism is protecting, and expanding, Low Power Radio.

Low Power Radio is LOCAL Power Radio.

I urge the Task Force to make these recommendations to the full Commission:

## EXPEDITED RELIEF ON

### TRANSLATOR AND SERVICE STATUS REFORM

The Task Force should seek immediate action, by the full Commission, to answer the urgent call for translator and Service Status reform in a November 14 Petition For Rulemaking, filed by THE AMHERST ALLIANCE and 52 other parties. The parties include Low Power and full power broadcasters, plus secular and religious broadcasters.

The Petition calls for Tertiary Service Status for "satellites", and other long distance translators, as well as numerical limits on ownership of translators. The Petition also urges an investigation of misrepresentations, and other abuses, in translator applications.

## EXPEDITED RELIEF ON

### INTERFERENCE FROM IBOC DIGITAL RADIO

The Task Force should seek immediate action, by the full Commission, to answer the same Petition's call for expedited relief from interference caused by In Band On Channel (IBOC) Digital Radio.

A 40-party Petition For Reconsideration of IBOC approval was filed more than a year ago, on October 25, 2002, in FCC Docket 99-325. While waiting for the FCC to finally respond to that Reconsideration Petition, the November 14 Rulemaking Petition seeks a regulatory mechanism for approving wattage and/or tower height adjustments, in those cases where IBOC interference can be demonstrated. These adjustments should be limited to the level that is necessary to restore the originally authorized service areas.

## ADJACENT CHANNEL SPACING REFORM FOR THE LOW POWER FM RADIO SERVICE

The Task Force should seek immediate action, by the full Commission, to recommend Congressional action to repeal the current statutory requirement for third adjacent spacing for Low Power FM stations. This recommendation is amply justified by conclusions of the FCC's own technical staff, in studies conducted in 1999, and by recommendations of the MITRE Corporation, following Congressionally mandated independent studies in 2002. The MITRE Report was made public on July 10 and the deadline for public comments, in FCC Docket 99-25, expired on October 14. It is time for the FCC to recommend the obvious.

## ESTABLISHMENT OF A NEW LOW POWER AM (LPAM) RADIO SERVICE

Consideration, by the Localism Task Force, of the recently filed Petition For Rulemaking to establish a new Low Power AM Radio Service -- coupled with an ultimate decision, when the Task Force prepares its recommendations to the full Commission during the summer of 2004, to urge the issuance of a Notice Of Proposed Rulemaking on LPAM. The starting point for Task Force action should be the Petition For Rulemaking that was filed by Fred Baumgartner, C.P.B.E. of Colorado. That Petition was placed in the Localism Task Force Docket through a filing on October 22.

In some areas, the FM Band is so crowded that even LPFM channel spacing reform will not open up frequencies for Low Power Radio. In Metro Detroit, Metro Boston and other urban areas, LPAM may be the only way to license any Low Power Radio stations.

The Baumgartner Petition is a good starting point, but I [we?] endorse improvements recommended in December 5 Written Comments by THE LPAM TEAM, an affiliate of THE AMHERST ALLIANCE. The recommendations include replacing the proposed minimum manned air time requirement, and the proposed 85-hour limit on weekly hours of operation, with the policies that are now in place for LPFM stations ... establishing Primary Service Status for LPAM stations ... creating a mechanism for resolving possible interference disputes between LPAM stations ... and reducing, modestly, the proposed minimum mileage separations between LPAM stations and full power stations.

In addition, I would urge the Task Force to consider ruling as mandatory that future FM/AM receivers be equipped to receive AM stereo broadcasts.

For the reasons indicated, I urge favorable action on the recommendations above.

Sincerely,

Daniel Brown